

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE: EPHEDRA PRODUCTS LIABILITY :
LITIGATION :
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04 M.D. 1598(JSR)

PERTAINS TO ALL CASES
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**NOTICE OF MOTION AND MOTION FOR REIMBURSEMENT OF
EXPENSES INCURRED BY ANDREWS & THORNTON PRIOR
TO THE ASSIGNMENT OF MDL 1598**

PLEASE TAKE NOTICE that at on May 8, 2008, or as soon thereafter as the matter may be heard in Courtroom 14B of the above entitled court, before the Hon. Jed S. Rakoff, Andrews & Thornton, by and through John C. Thornton, will and hereby does respectfully request that this Court approve its application for an order reimbursing litigation expenses incurred by Andrews & Thornton prior to the assignment of MDL 1598.

This motion will be based on this Notice of Motion and the Affidavit of John C. Thornton, Esq. and the exhibits attached thereto, which are filed concurrently herewith.

Such motion will also be based on all pleadings and papers filed in this action, any matter of which the Court must or may take judicial notice, on such further evidence the Court may deem proper and necessary, and on such further oral and documentary evidence as may be submitted at or before the time for hearing.

ANDREWS & THORNTON

April 30, 2008



JOHN C. THORNTON